



United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N	W A R 0 0 1 1 3 4	1 2 0 8 1 6	-	R	2
Remarks					
21					
66					
Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved	
67 1 0 69	70	71	72	73	74 75 80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Saint-Gobain Containers, Inc 5801 East Marginal Way South Seattle, WA 98134	Entry Time/Date 8/16/12 9:05 am	Permit Effective Date 1/1/10
	Exit Time/Date 8/16/12 5:10 pm	Permit Expiration Date 1/1/15
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Marlon Trigg, Environmental Health & Safety Manager, 206-768-6221 Cell: 206-730-1888 Fax: 206-768-6266	Other Facility Data (e.g., SIC NAICS, and other descriptive information) SIC: 3221	
Name, Address of Responsible Official/Title/Phone and Fax Number Doug Coburn, Plant Manager, 206-768-6221 Saint-Gobain Containers, Inc 5801 East Marginal Way South Seattle, WA 98134	Contacted <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> MS4
<input checked="" type="checkbox"/> Records/Reports	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Pollution Prevention	
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Storm Water	
<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow	
<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes SEV Description

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RECEIVED

AUG 20 2012

Inspection & Enforcement Management Unit
(IEMU)

Name(s) and Signature(s) of Inspector(s) Brian Levo	Agency/Office/Phone and Fax Numbers EPA/OCE 206-553-1816	Date 8/20/12
Joseph Roberto	EPA/OCE 206-553-1669	
Signature of Management Q A Reviewer Kimberly A. Ogle	Agency/Office/Phone and Fax Numbers EPA/OCE/IEMU 3-0955	Date 9/19/12

INSTRUCTIONS

Section A: National Data System Coding (i.e., PCS)

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. (Use the Remarks columns to record the State permit number, if necessary.)

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A Performance Audit	U IU Inspection with Pretreatment Audit	! Pretreatment Compliance (Oversight)
B Compliance Biomonitoring	X Toxics Inspection	@ Follow-up (enforcement)
C Compliance Evaluation (non-sampling)	Z Sludge - Biosolids	{ Storm Water-Construction-Sampling
D Diagnostic	# Combined Sewer Overflow-Sampling	} Storm Water-Construction-Non-Sampling
F Pretreatment (Follow-up)	\$ Combined Sewer Overflow-Non-Sampling	: Storm Water-Non-Construction-Sampling
G Pretreatment (Audit)	+ Sanitary Sewer Overflow-Sampling	~ Storm Water-Non-Construction-Non-Sampling
I Industrial User (IU) Inspection	& Sanitary Sewer Overflow-Non-Sampling	< Storm Water-MS4-Sampling
J Complaints	\ CAFO-Sampling	> Storm Water-MS4-Audit
M Multimedia	= CAFO-Non-Sampling	
N Spill	2 IU Sampling Inspection	
O Compliance Evaluation (Oversight)	3 IU Non-Sampling Inspection	
P Pretreatment Compliance Inspection	4 IU Toxics Inspection	
R Reconnaissance	5 IU Sampling Inspection with Pretreatment	
S Compliance Sampling	6 IU Non-Sampling Inspection with Pretreatment	
	7 IU Toxics with Pretreatment	

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A --- State (Contractor)	O --- Other Inspectors, Federal/EPA (Specify in Remarks columns)
B ---- EPA (Contractor)	P --- Other Inspectors, State (Specify in Remarks columns)
E --- Corps of Engineers	R --- EPA Regional Inspector
J --- Joint EPA/State Inspectors—EPA Lead	S --- State Inspector
L ---- Local Health Department (State)	T --- Joint State/EPA Inspectors—State lead
N --- NEIC Inspectors	

Column 20: Facility Type. Use one of the codes below to describe the facility.

- 1 --- Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 --- Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 --- Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 --- Federal. Facilities identified as Federal by the EPA Regional Office.
- 5 --- Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. (Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

***NPDES
Inspection Report***

***Verallia
Saint-Gobain Containers, Inc.
Seattle, WA***

August 16th, 2012

Prepared by:

***Brian Levo
Environmental Protection Agency, Region 10
Office of Compliance and Enforcement
Inspection and Enforcement Management Unit***

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(Unless otherwise noted, all details in this inspection report were obtained from conversations with Marlon Trigg or from observations during the inspection.)

I. Facility Information

Facility Name: Verallia

Facility Owner/Operator: Saint-Gobain Containers, Inc.

SIC Codes: 3221- Glass Containers

Facility Contact(s): Marlon Trigg, Environmental Health & Safety Manager
Office: (206) 768-6221
Cell: (206) 730-1888

Facility and Mailing Address: 5801 East Marginal Way South
Seattle, WA 98134

Lat/Long: +47.551279° / -122.337163°

Permit Number: WAR001134

II. Inspection Information

Inspection Date: August 16, 2012

Inspectors: Brian Levo, Inspector
EPA Region 10, OCE / IEMU
(206) 553-1816

Joe Roberto, Puget Sound Enforcement Coordinator
EPA Region 10, OCE / NCU
(206) 553-1669

Arrival Time: 9:05 AM

Departure Time: 5:10 PM

Weather: Sunny

Purpose: Determine compliance with the Washington State NPDES Industrial Stormwater General Permit and the Clean Water Act.

III. Permit Information

Saint-Gobain Containers, Inc. (SGCI) is currently permitted under the Washington State NPDES Industrial Stormwater General Permit (ISGP), with the permit number WAR001134. This permit was recently modified with the new effective date of 07/01/2012. The original effective date of the permit is 01/01/2010. Prior to 01/01/2010 the facility was operating under ISGP number SO3001134.

IV. Background and Activity

According to Marlon Trigg, the facility is approximately 17 acres in size and manufactures glass food and beverage containers. The facility is bisected by Ohio Ave, which runs north to south through the middle of the facility (**Map 1, Attachment A**). The areas of the facility on the eastern side of Ohio Ave predominately drain to the combined storm sewer system, while Ohio Ave and the areas of the facility on the western side drain to storm drains discharging into the Duwamish River.

V. Inspection Entry

This was an unannounced inspection. Joe Roberto and I presented our credentials to Marlon Trigg upon arriving at the facility at 9:05 am on 08/16/2012.

Upon our arrival Mr. Trigg asked us if we could return at 10am, so that he could attend a morning meeting. Mr. Roberto and I left the facility and returned at approximately 10 am on 08/16/2012 to begin the inspection.

Mr. Trigg did not deny us access to the facility. We were allowed to inspect all areas that we wished to inspect.

VI. Inspection Chronology

Upon returning to the facility at 10 am, we began the inspection with an opening conference where we discussed the purpose and expectations of the inspection. We then performed a file review, conducted an inspection of the facility, and held a closing conference to discuss compliance-related concerns.

VII. Owner and Operator Information

According to Mr. Trigg, the facility is owned and operated by SGCI, but the facility is named Verallia after a specific brand of glass container, owned by SGCI, being manufactured at that location.

VIII. Records Review

The following documents were reviewed:

- Current WAR001134 Permit – There was not a copy of the newest permit (modified permit, effective 07/01/2012) on-file at the time of inspection. There was a copy of the unmodified version, effective 01/01/2010, on-file.
- Previous Permit SO3001134 – There were copies of expired permits for ISGP coverage prior to 2010 on-file at the time of inspection.
- Stormwater Pollution Prevention Plan (SWPPP) – The SWPPP on-file was last signed and certified on 07/13/2012. It was included as a section of the facility's Spill Prevention and Emergency Cleanup Plan (SPECP). A copy the SWPPP document provided by the facility is included as **Attachment C**.

At the time of inspection, the SWPPP map did not identify the sampling location. However, the map did identify storm drain catch basins and each of the outfalls. Following the inspection Mr. Trigg sent me a digital copy of the SWPPP including a different map of the storm drain system (**Map 2, Attachment A**). This SWPPP map also does not identify the sampling location.

At the time of inspection the pollution prevention team (Table 9-1 of SWPPP) did not appear to be current. Mr. Trigg stated that Jim Moretti was no longer working in the capacity listed in the table. Mr. Trigg also told us that stormwater pollution prevention team members receive annual training using a software program. In a follow-up phone conversation after the inspection, Mr. Trigg stated that he had hired an intern that was working on updating the training system, as well as, addressing the areas of concern presented in the last section of this report.

At the time of inspection the SWPPP also did not describe why the facility only samples drainage from outfall 002 when the facility has 5 different storm drain outfalls. Mr. Trigg stated that outfall 001 drains runoff from S. Fidalgo St, and outfalls 003 and 004 both drain parking areas. The table in section 9.3.4 of the SWPPP provides estimates of the percentage proportions of the facility that drain to each outfall, as well as, additional details about the characteristics of each of the drainage areas. According to Mr. Trigg and the SWPPP outfall table, outfall 005 drains stormwater from J.A. Jack & Sons, a business that appears to process limestone on the northern border of SGCI.

At the time of the inspection, the section of the SWPPP describing benchmark monitoring criteria (9.9.2) lists that "The storm event must be at least 0.1 inches of rain in a 24-hour period" and "The storm event sampled must be preceded by at least 24 hours of no greater than trace precipitation" in order to be eligible for sampling. These are outdated requirements that were included in versions of the ISGP prior to the 2010 version.

Lastly, during our facility inspection Mr. Trigg pointed out that the company eCullet Inc. has been leasing one of the SGCI warehouses for approximately 2-3 years. Mr. Trigg said that the company also processes waste glass (known as

“cullet”). Neither the company name nor their operations appeared to be included anywhere in the SWPPP at the time of inspection. Mr. Trigg also expressed uncertainty if eCullet possesses their own permit or maintains their own SWPPP.

- **Discharge Monitoring Reports (DMRs)** – We reviewed DMRs dating back five years to the third quarter (Q3) of 2007 through Q2 of 2012. The following table summarizes the quarters in which benchmarks were exceeded and quarters when sample results were not submitted:

Parameter	Quarter/Year
Zinc (Zn)	Q3/2007, Q4/2007, Q4/2008, Q2/2009, Q2/2010, Q2/2011, Q3/2011
Copper (Cu)	Q3/2010, Q2/2011, Q3/2011
Turbidity	Q4/2007, Q4/2008
Total Suspended Solids (TSS)	Q3/2007, Q4/2007
No Sample Submitted	Q3/2009, Q4/2009, Q4/2010, Q1/2011, Q4/2011

We asked Mr. Trigg to explain why sampling was not completed in the 5 quarters identified above. Mr. Trigg cited explanations included with the DMRs submitted to EPA (**Attachment D**). According to the DMRs, a variety of factors inhibited sampling. These factors are summarized in the following table:

Quarter/Year Not Sampled	Explanations
Q3/2009	Low rainfall; Discharges occurred during high tidal flows
Q4/2009	Discharges occurred during high tidal flows, at night (too dangerous), or the 0.1” of rainfall criteria not met
Q4/2010	Discharges occurred during high tide, on weekends (after business hours), or did not otherwise meet sample criteria
Q1/2011	Discharges occurred on weekends or did not meet the 24 hour antecedent dry period sampling criteria
Q4/2011	Discharges occurred at night, during high tide, or did not meet the 24 hour antecedent dry period sampling criteria

Mr. Roberto expressed concerns to Mr. Trigg regarding SGCI’s inability to complete the required benchmark sampling for Q4/2009, Q4/2010, Q1/2011, and Q4/2011. Mr. Roberto explained that his concerns stemmed from the fact these four quarters traditionally experience high amounts of rainfall. In addition, SGCI included outdated sampling criteria from the previous version of the ISGP, identified in the SWPPP section above, when determining if storm events were eligible under the permit requirements. Following erroneous sampling criteria appears to have contributed to the determination that there were no suitable rain events in which to sample in Q4/2010, Q1/2011, and Q4/2011.

The DMRs also documented the Level One and Level Two Responses, as well as, the Corrective Actions (CAs) SGCI claims to have completed in response to benchmark exceedances. Further detail of the 2010 and 2011 CAs was also included in the Annual Summary Reports.

According to the DMRs, following exceedances of Zn and TSS in Q3/2007 SGCI performed a source assessment and implemented sweeping along paved surfaces as their Level One Response. The benchmarks for these parameters were exceeded again in Q4/2007 along with turbidity, leading to a Level One Response for turbidity and Level Two Responses for Zn and TSS. These responses combined to include further source assessments which identified contaminated cardboard stored on uncovered pallets, as well as, residues from truck and forklift brakes, as being sources of these pollutants. Following the assessment, SGCI implemented cleaning the entire storm drain system using a vactor truck, installing catchbasin filter inserts, and increased monthly pavement sweeping.

The DMR cover letter in Q4/2008 identified an “additional round of storm drain cleanouts” as a Level One Response to exceedances of Zn and turbidity.

The DMR cover letter in Q2/2009 cited weekly street sweeping, quarterly storm drain cleaning, and replacing damaged trash and recycle bins as components of their Level One Response to the Zn benchmark exceedance.

In Q2/2010 a Level One Response was completed due to Zn exceedance. This response included a source assessment which identified “spent mold lubricant containers” along Ohio Ave. The CA implemented included daily sweeping along Ohio Ave. A second Level One Response was completed for Cu in Q3/2010. This also cited “spent mold lubricant containers” in proximity to storm drains on Ohio Ave as potential sources of pollution. Additional sweeping and storm drain cleanouts were identified as CAs.

In Q2/2011 a Level One Response was completed for both Zn and Cu exceedances. These responses included a source assessment which identified uncovered pallets and uncontaminated machine parts stored on Ohio Ave. The CA implemented included increased sweeping and frequency of storm drain catchbasin filter installation. The benchmarks for these parameters were exceeded again in Q3/2011 along with turbidity, leading to a Level One Response for turbidity and Level Two Responses for Zn and Cu. These responses combined to include further source assessments which again identified uncovered pallets and uncontaminated machine parts stored on Ohio Ave as being sources of these pollutants. Following the assessment, SGCI again implemented additional sweeping and frequency of storm drain catchbasin filter installation, as well as, replacing drain elbows.

- Spill Prevention and Emergency Cleanup Plan – We reviewed the most recent copy of the SPEC. At the time of inspection the SWPPP was included as a component of the SPEC. The SPEC on-file appeared to have its own revision date, and had last been revised in March, 2010.
- Chain-of-Custody (COC) & Sampling Reports – We reviewed COCs and sampling reports for samples dating back five years to Q3/2007.

SGCI formerly contracted both the sampling and lab analyses to URS Corporation (prior to Q2/2011) whom subcontracted lab analyses to TestAmerica Laboratories, Inc.

The URS sample reports indicated that when taking samples URS staff both used a pH paper strip as well as had the TestAmerica lab analyze pH values. The sample reports and COCs also indicated that the holding time for pH was exceeded in every instance, and URS subsequently identified the pH value provided by the TestAmerica as an “estimate” in the sampling reports. COC reports showed that it typically took URS several hours or more to transport and deliver the samples to TestAmerica, exceeding the rather short hold time for pH analysis. Comparing the lab results and URS sampling notes to the DMRs indicated that SGCI reported the “estimated” pH value as analyzed by TestAmerica, for every quarter between Q3/2007 and Q1/2011 in which samples were submitted (11 instances).

Beginning in Q2/2011 SGCI has contracted sampling and analyses to Hart Crowser, Inc., who also subcontracted lab analyses to TestAmerica. The most recent version of the SWPPP does not identify Hart Crowser as being responsible for collecting stormwater samples. Instead, Table 9-1 of the SWPPP identifies 4 SGCI personnel as sharing all of the responsibilities associated with the permit.

After reviewing the DMRs, the corresponding Hart Crowser sampling reports, lab results, and COCs from Q2/2011-Q2/2012, the pH sample holding times were also exceeded in Q3/2011 and Q2/2012.

- Site Inspection Reports – We reviewed the quarterly visual inspection reports between Q3/2007 and Q4/2009, as well as the monthly visual inspection reports between Q1/2010 and Q2/2012. All five outfalls described in the SWPPP were inspected by either SGCI personnel or contractor personnel during this time period.

There were numerous instances where monthly inspection reports were signed by an inspector but the certification page was left blank. This occurred on each of these dates: 3/29/2010, 4/1/2010, 6/4/2010, 7/7/2010, 8/3/2010, 9/8/2010, and 5/11/2011. In each of these instances Mr. Trigg was the inspector and the certification page was left blank where the authorizing official was to have signed and dated.

I reviewed the inspection reports for each of the five quarters sampling was not completed (Q3/2009, Q4/2009, Q4/2010, Q1/2011, and Q4/2011). Visual inspections were completed in three of these quarters (Q4/2010, Q1/2011, and Q4/2011). Each of these inspections was conducted by Marlon Trigg during rainfall events. These reports included a stormwater discharge characteristics section where Mr. Trigg recorded information such as the color, odor, and clarity

of the discharge. Furthermore, in the Q4/2011 visual inspection report (dated: 10/11/2011), Mr. Trigg estimated the discharge flow to be approximately 30-40 gal/min from outfall 002 during that inspection. We asked Mr. Trigg why a sample had not been taken on that day. Mr. Trigg explained that the sampling responsibilities are designated to the contractors. Mr. Trigg then stated that he would call the contractor in the future if a discharge is witnessed during a visual inspection to ensure that at least one sample is collected during each quarter. Copies of the outfall 002 portion of these visual inspection reports are included as **Attachment E**.

In addition to monthly visual inspections, Mr. Trigg stated that he has also been conducting weekly inspections. Mr. Trigg showed us examples of these weekly inspections on-file and played a short audio recording of one of these inspections. We did not thoroughly review the weekly inspection reports during the inspection.

- Annual Summary Reports - We reviewed the annual reports for 2010 and 2011 that summarize CAs resulting from benchmark exceedances in those years. These reports were signed, certified, and submitted by the required due date.

IX. Facility Review

Following the file review, Mr. Trigg escorted Mr. Roberto and me on our site inspection. During the site inspection we only reviewed outdoor locations including Ohio Ave and the southern, western, and northern sections of the facility. Mr. Trigg took side-by-side photos for every photo taken during the inspection.

We began the site inspection by examining the cullet being stored in uncovered piles in the southwest corner of the facility (**Photos 1-5, Attachment B**). Mr. Trigg explained that the cullet is recycled glass used to make the glass containers produced at the facility. At the time of inspection there appeared to be cullet littering the pavement and most other areas all along the western and southwestern portions of the facility. There also appeared to be spilled cullet on the backside of the ecology blocks used to contain the piles (**Photo 2**). This spilled cullet was less than fifty feet from the Duwamish River with only some shrubs and a rocky embankment sloping down to the river standing between them. Mr. Trigg admitted that the stray pieces of cullet littered throughout the western side of the facility were due to the fact that street sweeping BMPs were most frequently implemented along Ohio Ave since Ohio Ave drains to outfall 002, which is the only outfall the facility samples.

Just south of the cullet piles there was a drain on S. Fidalgo St. that appeared to be a storm drain. Mr. Trigg was not able to tell us where the drain flowed to, but he did not believe it flowed to any of the 5 outfalls monitored by SGCI. Mr. Trigg also said he believed that both stormwater runoff from the neighboring facility to the south of SGCI and drainage from S. Fidalgo St. drained into the unknown catch basin. Mr. Roberto informed Mr. Trigg that it appeared that the slope of the SGCI property is such that stormwater runoff from the exposed cullet piles would also likely flow into the drain.

Furthermore, there also was an unidentified outfall pipe immediately south of the cullet pile and just to the west of the unknown storm drain. Mr. Roberto also informed Mr. Trigg that he thought that drainage into the unknown storm drain could be discharging into the Duwamish River from the unknown outfall. Mr. Trigg claimed that the cullet should not discharge any pollutants as it had not been ground down fine enough to pose a pollution hazard. However, Mr. Trigg also admitted that drainage directly from the cullet piles had never been analyzed for pollutants. Section 9.3.1 of the facility SWPPP states that cullet contains "small amounts of carbocite, iron pyrites, iron chromite, salt cake, powder blue, and selenium."

Immediately north of the cullet storage area were two dumpsters left uncovered at the time of inspection (**Photos 5 & 6**). The dumpsters appeared to contain wood, cardboard, tires, and pieces of metal.

We then viewed outfall 002 which was clearly labeled at the time of inspection. Just to the northeast of outfall 002 were loading docks as well as a truck parking area. Mr. Roberto asked Mr. Trigg where roof drainage from the buildings west of Ohio Ave flowed. Mr. Trigg was not sure if the roof runoff flowed through drainage pipes on the west side of the building or the east side. Mr. Trigg was also uncertain where the drainage pipes on the western half of the building flowed. It appeared that most of the roof drainage pipes channel runoff to some point below the asphalt surface. Mr. Roberto also pointed out that many of the drainage pipes on the western side of the building were rusted, damaged, and some were completely missing (**Photo 7**). Mr. Trigg admitted that the roof drainage system was very old and in need of repair. He also suggested that some of the roof drainage flows off the western side of the buildings in sheets onto the pavement in the vicinity of the loading docks and truck parking area. I reviewed the SWPPP following the inspection, and according to the SWPPP outfall table (section 9.3.4), outfalls 003 and 004 are identified as being points of discharge for roof stormwater runoff.

Mr. Trigg informed us that the warehouse at the northwestern corner of the facility closest to outfalls 003 and 004 was the one being leased by the company eCullet. We observed that there was a storm drain catch basin on the south end of this building that Mr. Trigg believed flows to outfall 003 (**Photo 8**). We noted that the roof drains along the west side of the eCullet building were newer and did not appear to be damaged (**Photo 9**). Along the northwestern edge of the SGCI property and the northern end of the eCullet warehouse, there appeared to be white particulates or dust covering the road and all other outdoor surfaces at the time of inspection. It appeared that the particulates were originating from either J.A. Jack & Sons (company north of SGCI, **Photo 10**) or a baghouse being operated by eCullet located on the outside of the north side of their building (**Photo 11**). I asked Mr. Trigg what the baghouse was used for and he explained that he thought the baghouse captured particulates associated with cullet crushing and processing being performed by eCullet.

Mr. Trigg also stated again that while he was unsure of what the details are in the lease agreement with eCullet, and that SGCI does not take responsibility for any drainage

coming from their operations. However, the SGCI SWPPP covers the entire property including the building being leased by eCullet. In addition, SGCI inspects outfalls 003 and 004, which appear to drain the stormwater runoff associated with the eCullet building roof and operations. At the time of inspection Mr. Trigg was not able to provide us a clear explanation of what areas outfalls 003 and 004 drain except that they drain sections of the paved parking areas and road along the northern and western boundaries of SGCI.

We then inspected Ohio Ave, which runs through the middle of the facility. At the time of inspection Ohio Ave appeared to be noticeably cleaner and free of cullet or particulates covering the pavement and roadway. This, again, was most likely due to the fact that the street drains to outfall 002, so it appears SGCI implements their street sweeping BMPs along the entire street.

At the north end of Ohio Ave we found a third uncovered dumpster (**Photo 12**). At the time of the inspection the dumpster lid was pinned behind it against the wall. The dumpster wheels were also damaged and did not look like it could be moved easily. Mr. Trigg explained that it was probably damaged from a forklift collision. The dumpster contained mostly wood and cardboard. We also saw a fourth uncovered dumpster located on Ohio Ave that contained scrap metal (**Photo 13**).

We saw a fuel tank on Ohio Ave that was covered by a roof and had proper secondary containment (**Photo 14**). There was also a spill kit located immediately next to it at the time of inspection. We saw two totes stored outside on the side of Ohio Ave without any secondary containment (**Photo 15**). This area is a high traffic area with a lot of trucks and forklifts moving through it. Mr. Trigg claimed that he frequently instructs personnel not to leave totes in uncovered locations or areas without secondary containment, but he admitted that it still sometimes occurs. The tote labels said they contained glass mold and bonding adhesives.

There was a kerosene barrel and a mold lubricant barrel being stored undercover and with a secondary containment pad on the side of Ohio Ave (**Photo 16**).

We also saw a front loader with its tires removed sitting on the side of Ohio Ave in close proximity to one of the storm drain that flows to outfall 002 (**Photo 17**). Mr. Trigg assured us that no vehicle maintenance occurs on Ohio Ave. The vehicle was not undergoing maintenance, nor was there any visible fluids draining from it at the time of inspection.

Finally, we inspected the location of a catch basin that flows to outfall 001. Mr. Trigg was unsure of the number and the location of catch basins that flowed to outfall 001. I used a copy of a 2009 storm and floor drain connectivity map included with a copy of SGCI's SWPPP (**Map 2, Attachment A**), previously provided to me by the Department of Ecology (DOE), to guide us to a catch basin that discharges to outfall 001. The catch basin was located on the southern end of the east side of the facility (**Photos 18 & 19**). It was located in an open area surrounded by numerous buildings that house various operations. There were no operations taking place outside in the vicinity of the outfall at

the time of inspection.

X. Observed Discharge

We did not observe any discharge at the time of inspection.

XI. Receiving Water

The nearest surface water to this facility is the Duwamish River.

XII. Areas of Concern

A. Old ISGP On-file

Section S9.C.1.a. of the ISGP states that the permittee shall retain a copy of this permit onsite for a minimum of five years.

At the time of inspection the facility did not appear to have a copy of the current version of their permit on-file. However, Mr. Trigg did provide us a copy of the older unmodified version (01/01/2010).

B. SWPPP

1. Map

Section S3.B.1.e. of the ISGP states that the SWPPP map shall identify “Each sampling location by unique identifying number.”

Neither the SWPPP map on-file at the time of inspection, nor the map included with the digital copy of the SWPPP provided to us following the inspection (**Map 2, Attachment A**), identified where sampling occurred. These maps should be amended to include sampling locations.

2. Stormwater Pollution Prevention Team

Section S3.B.3. of the ISGP states that “The SWPPP shall identify specific individuals by name or by title within the organization (pollution prevention team) whose responsibilities include: SWPPP development, implementation, maintenance, and modification.”

At the time of inspection the pollution prevention team included in Table 9-1 of the SWPPP (**Attachment C**) was not current. Mr. Trigg admitted that one individual, Jim Moretti, no longer held the SWPPP responsibilities included in the table.

3. Sampling Criteria Outdated

At the time of the inspection, the section 9.9.2 of the SWPPP describing sampling requirements included:

- “7. The storm event must be at least 0.1 inches of rain in a 24-hour period
- 8. The storm event sampled must be preceded by at least 24 hours of no greater than trace precipitation.”

As stated before, this is an outdated requirement formerly included in versions of the ISGP prior to the 2010 version. The facility has maintained this criteria in their SWPPP since the 2010 ISGP has been implemented. Thus, the facility is not sampling in accordance with the new permit requirements.

The sampling criteria section of the SWPPP should be updated to reflect the current requirements in the ISGP.

4. Outfalls Monitored

Section S4.B.2.c. of the ISGP states that “The Permittee shall sample each distinct point of discharge off-site except as otherwise exempt from monitoring as a “substantially identical outfall” per S3.B.5.b.”

Section S3.B.5.b. of the ISGP states that the SWPPP sampling plan shall “Include documentation of why each discharge point is not sampled” including the “Location of which discharge points the Permittee does not sample because the pollutant concentrations are substantially identical to a discharge point being sampled” and documenting the industrial activities, BMPs, and exposed materials potentially contributing to pollution, “located in the drainage area of each outfall.”

Section 9.9.2.1. of the SWPPP identifies outfall 002 as the facility’s designated sampling point since it “represents 35 to 45 percent of the Facility served by the storm sewer system.” And that “Based on similar activities and site conditions, this outfall is most representative...” However, there is no documentation included in the SWPPP that indicates the facility has substantiated this claim by measuring and comparing pollution concentrations of effluent from outfalls 001, 003, 004, or 005. Also, the SWPPP does not document the individual industrial activities, BMPs, or exposed materials that could potentially contribute pollution, specific to each of the outfall drainage areas.

After speaking with Mr. Trigg and inspecting the site, it appears street sweeping BMPs are primarily being implemented along Ohio Ave. The disparity in street sweeping was evident during the inspection, as cullet pieces were dispersed along the western and southwestern areas of the facility, but largely absent along Ohio Ave. In addition, dust particulates were evident along the northwestern side of the facility.

Section 9.5.3 of the SWPPP appears to partially explain this disparity. This section of the SWPPP establishes that while Ohio Ave is to be swept daily, the rest of the paved

portions of the facility are only to be swept weekly. The same section of the SWPPP goes on to require installation of catchbasin filters and drain elbows only for drains along Ohio Ave.

Mr. Trigg also admitted during the site review portion of the inspection that street sweeping BMPs were largely concentrated on Ohio Ave since drainage from that area discharges to the only outfall sampled at the facility, outfall 002.

At the time of inspection, the variety and extent of industrial activities, BMPs, and the exposed materials varied in each of the outfall drainage areas. Therefore, SGCI should either begin benchmark monitoring of outfalls 001, 003, 004, and 005, or further analysis and documentation must be conducted to meet the ISGP requirements for establishing these other outfalls as “substantially identical.”

In a follow-up phone conversation after the inspection, Mr. Trigg stated that he had spoken to Hart Crowser about this concern and will be requiring them to begin sampling outfalls 001, 003, and 004. He also stated that outfall 005 would be difficult to monitor and was uncertain whether SGCI will pursue monitoring of that outfall.

5. Additional Discharge

Section S4.B.2.a. of the ISGP states that “The permittee shall designate sampling location(s) at the point(s) where it discharges stormwater associated with industrial activity off-site.”

Based on the slope of the site at the time of inspection, runoff from the exposed cullet pile would most likely discharge off-site into an unknown drain immediately south of the cullet piles (**Map 1**) (**Photo 4, Attachment B**). It appeared that this drain discharges to the Duwamish River through an unknown outfall directly west of the unknown drain.

It appears that SGCI should implement BMPs to prevent off-site runoff of stormwater, or SGCI needs to conduct benchmark monitoring of the runoff into this drain.

6. Inclusion of eCullet Activities

Section S3.B.2. of the ISGP states that “The facility assessment shall include...an inventory of facility activities and equipment that contribute to or have the potential to contribute any pollutants to stormwater...” These potential sources include “Roofs or other surfaces exposed to air emissions from a manufacturing building or a process area.”

The SWPPP does not mention the operations being conducted by eCullet Inc. At the time of inspection we observed that eCullet was operating a baghouse on the north side of the building they lease (**Photos 10 & 11**). There were also particulates blanketing the outdoor surfaces along the northwestern border of SGCI. These particulates could have been associated with the baghouse. Mr. Trigg claimed that SGCI is not responsible for drainage from eCullet operations including the exposed bag house. However, Mr. Trigg

was uncertain what the terms of the leasing agreement are between SGCI and eCullet, and if eCullet is in possession of their own NPDES permit. In addition, SGCI inspects the road and pavement surrounding eCullet as well as outfalls 003 and 004, which discharge roof and surface runoff from eCullet.

It appears that the SWPPP should be updated to include eCullet Inc. and all of its associated operations that may affect stormwater.

7. Inclusion of Contractors

Section S3.B.5. of the ISGP states that the SWPPP sampling plan must “Identify staff responsible for stormwater sampling.”

The SWPPP does not specify specific staff responsible for collecting stormwater samples. Instead, section 9.9.2 of the SWPPP identifies the “Facility’s Plant Manager” as being the person responsible for ensuring that quarterly samples are taken, and table 9-1 of the SWPPP identifies 4 SGCI personnel responsible for SWPPP implementation. Mr. Trigg informed us that Hart Crowser, Inc. is responsible for completing SGCI’s stormwater sampling.

It appears that the SWPPP should be updated to include Hart Crowser staff and their responsibilities.

8. Exceedances of Benchmarks

After reviewing the DMRs it appears that discharges from outfall 002 at SGCI exceeded quarterly benchmarks for the following parameters: zinc (7 quarters), copper (3 quarters), turbidity (2 quarters), and TSS (2 quarters). While exceeding a benchmark is not considered a violation under the ISGP, the number of exceedances over the past 5 years raises concerns whether the BMPs being implemented by SGCI are sufficient.

9. Quarterly Sampling Not Completed

Section S4.B.1. of the ISGP states “The Permittee shall sample the discharge from each designated location at least once per quarter.” It also states that “Permittees need not sample outside of regular business hours, during unsafe conditions, or during quarters where there is no discharge.”

The DMRs submitted for Q3/2009, Q4/2009, Q4/2010, Q1/2011, and Q4/2011 indicated the facility did not sample during those quarters (**Attachment D**). The DMRs also indicated that samples were not conducted for reasons that included discharges occurring at night, on weekends, during high tidal flows, and not meeting the sampling criteria established in the SWPPP.

As stated before, two of the sampling criteria cited in the SWPPP as reasons for not collecting samples became outdated with the issuance of the 2010 ISGP. These criteria included:

- “7. The storm event must be at least 0.1 inches of rain in a 24-hour period
- 8. The storm event sampled must be preceded by at least 24 hours of no greater than trace precipitation.”

These outdated sampling criteria appear to have contributed to the determination that there were no suitable rain events in which to sample in Q4/2010, Q1/2011, and Q4/2011. In addition, there were monthly visual inspection reports completed for at least one month within each of these three quarters that stated outfall 002 was inspected during a rainfall event (**Attachment E**). These inspection reports indicated Mr. Trigg inspected outfall 002 during rainfall events, and recorded characteristics of the discharge coming from the outfall at the time of those inspections. In the instance of Q4/2011 (inspection report dated 10/11/2011), Mr. Trigg even estimated the discharge rate of 30-40 gal/min from outfall 002. It appears, then, that SGCI was able to visually inspect outfall 002 during regular business hours, when the outfall was not covered by high tide, and at a time discharges were occurring, for each of these three quarters. Consequently, benchmark monitoring samples should have been collected in Q4/2010, Q1/2011, and Q4/2011.

10. Facility Inspection Report Certification

Section G2. of the ISGP requires that all records required by the permit be signed and certified by a qualified official.

When reviewing the facility inspection reports Doug Coburn, Plant Supervisor, is the appropriate signatory official. At the time of the inspection there were 7 monthly inspection reports in which the certification page was left blank. Mr. Trigg admitted that he was aware of some instances of uncertified inspection reports, but was uncertain if it was appropriate for these reports to be certified since they had been completed months (and in some cases years) ago. Mr. Roberto told Mr. Trigg that he should have the reports properly certified regardless of how long ago they were completed.

C. pH Holding Time

After reviewing the DMRs and sampling reports, the pH holding time was exceeded in 13 quarters over the past 5 years. In a follow-up phone conversation after the inspection, Mr. Trigg stated that he had spoken to Hart Crowser about this concern and has required them to change their sampling procedure to measure pH in the field using an electronic meter.

D. Exposed Cullet Pile

At the time of inspection piles of cullet were left exposed in proximity to a drain located on S. Fidalgo St (**Photos 1-5**). The piles were sprawling out both from the front and

spilling out from the back of the cullet storage area, allowing cullet to be dispersed along the western side of the facility. Mr. Trigg explained that he did not believe the cullet posed a pollution hazard, but also admitted that runoff from the cullet piles had not been analyzed for pollutants.

E. Baghouse Area

Section S3.B.4.b.i.2).c). of the ISGP states that the permittee shall “Inspect and maintain bag houses monthly to prevent the escape of dust from the system. Immediately remove any accumulated dust at the base of exterior bag houses.”

Section 9.5.2 of the SWPPP addresses Dust Control BMPs. It states the facility will “Sweep and cleanup dust accumulation areas that can contaminate stormwater at least quarterly.” The section also states the facility will “Inspect and maintain cyclone separators, cloud chambers, and any other Facility particulate collection devices monthly...” and “Any accumulated dust will be immediately removed and properly disposed.”

At the time of inspection there was a baghouse on the north side of the eCullet warehouse (**Photos 10 & 11**). It was uncertain if the particulates blanketing the surfaces around the baghouse were associated with the baghouse operations. Since Mr. Trigg claimed he was uncertain of the extent or frequency the baghouse is being inspected or maintained, then it could be depositing pollutants from air emissions on the roofs, roads, and other outdoor surfaces throughout the SGCi facility. These pollutants could then be mobilized by stormwater and discharged into the Duwamish through the facility outfalls.

At the time of inspection dust control BMPs specified in the SWPPP were not being implemented at the baghouse. It was unclear if these BMPs are sufficient in preventing pollution discharges associated with dust particulates.

F. Uncovered Dumpsters

Section S3.B.4.b.i.2).d). of the ISGP states that the permittee shall “Keep all dumpsters under cover or fit with a lid that must remain closed when not in use.”

At the time of inspection there were four dumpsters left uncovered while not in use (**Photos 5, 6, 12, 13**).

G. Uncovered Totes Without Secondary Containment

Section S3.B.4.b.i.4).a). of the ISGP states that the permittee shall “Store all chemical liquids, fluids...on an impervious surface that is surrounded with a containment berm or dike that is capable of containing 10% of the total enclosed tank volume or 110% of the volume contained in the largest tank.”

At the time of inspection two totes containing glass mold and bonding adhesives were being stored on the side of Ohio Ave. The totes were not being stored undercover and did not have any secondary containment (**Photo 15**).

H. Familiarity with Storm Drainage

At the time of inspection Mr. Trigg was unfamiliar with a couple of aspects of the storm drain system. Mr. Trigg was unable to identify exactly which storm drain(s) channeled stormwater to outfall 001. He was also unaware if roof drainage discharged through outfalls 003 and 004.

SGCI needs to verify the stormwater drainage system at the facility and take steps to ensure stormwater pollution prevention team members can identify all of the system components.

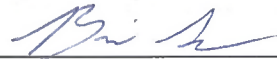
XIII. Closing Conference

A closing conference was held with Mr. Trigg to discuss our inspection observations. We discussed all of the areas of concern A, B, D, E, F, and G listed above and then thanked him for his time and assistance with the inspection. In a follow-up phone conversation after the inspection, I discussed areas of concern C and H with Mr. Trigg.

Report Completion Date:

9/18/2012

Lead Inspector Signature:



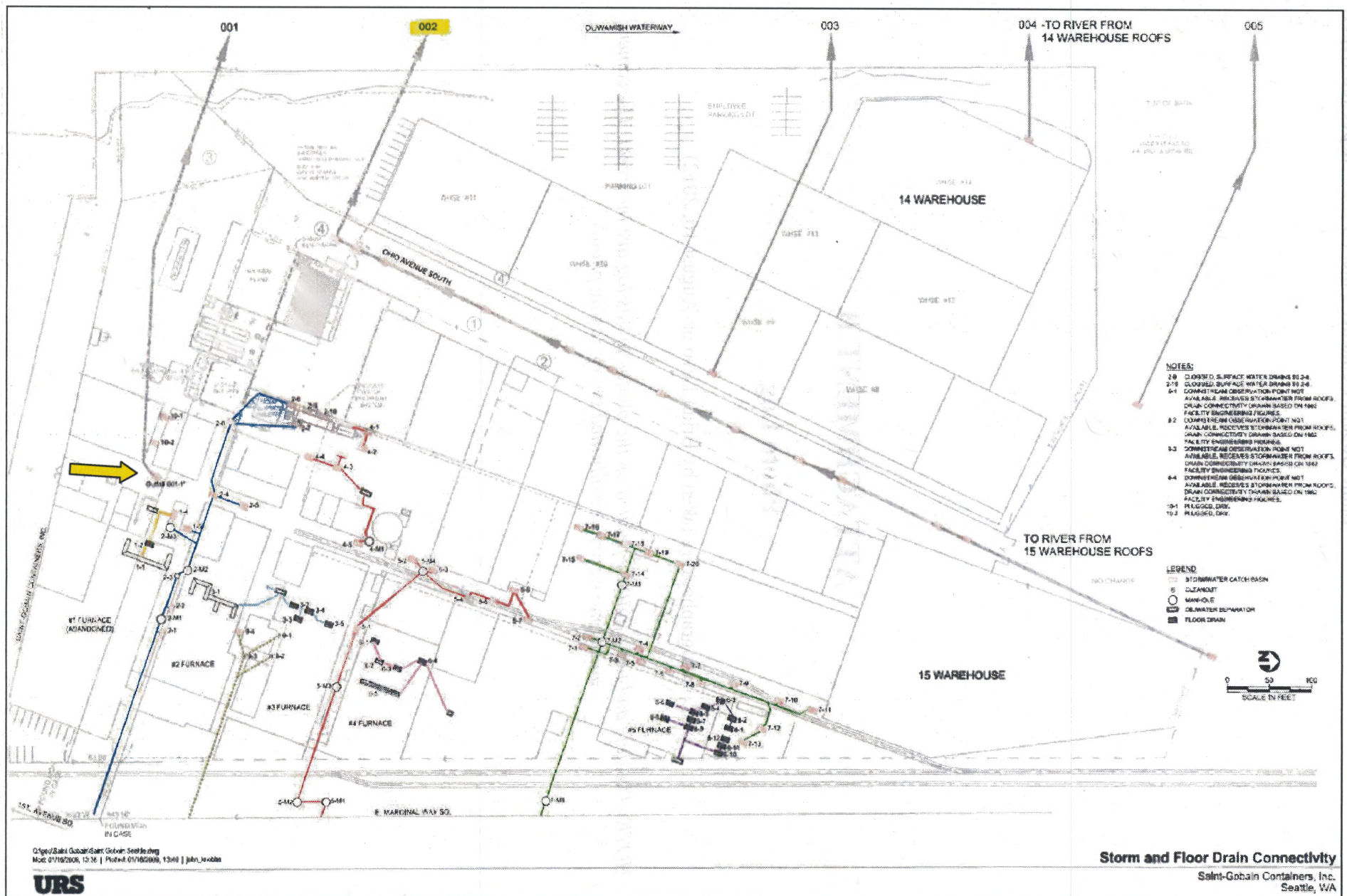
ATTACHMENT A

Site Maps

Saint-Gobain Containers, Inc



Map 1: Aerial photo with approximate facility boundaries (purple), outfalls, Ohio Ave, cullet storage area, and eCullet Inc. building identified. In addition, GPS data was collected at the location of a storm drain believed to flow to Outfall 001. It appears to be the only storm drain on the eastern side of the facility (and Ohio Ave). Map was created using ESRI ArcMap 10.0. Outfalls were mapped by georeferencing **Map 2** on top of the above aerial image.



Map 2: Drainage map included in SGCI's 07/13/2012 SWPPP. Outfalls are numbered, but not labeled, at the top of the map. The only catch basin believed to discharge to outfall 001 is identified with a yellow arrow.

ATTACHMENT B

Photo Log

(All photographs were taken by Brian Levo on August 16, 2012)

NOTE: The date and time digitally printed on the photos in this log are incorrect. The camera date/time were not calibrated before taking photos.



Photo 1 (SI851615): Exposed cullet piles stored at the southwestern corner of the facility near an unknown storm drain and unknown outfall. At the time of inspection pieces of cullet were littering the ground outside of the storage areas.



Photo 2 (SI851617): Cullet spilled through the back of the exposed storage piles. The Duwamish River is approximately fifty feet away through some brambles and down a rocky embankment (direction of yellow arrow).



Photo 3 (SI851618): An example of a piece of cullet.



Photo 4 (SI851619): Western view showing the slope between the cullet storage pile and the unknown catch basin (yellow arrow). It appeared that drainage into the basin discharges through an unknown outfall into the Duwamish River. The approximate location of the outfall is shown by a red arrow in the background of the photo.



Photo 5 (SI851620): Northwest view of an exposed cullet pile in the cullet storage area. At the time of inspection pieces of cullet were littering the ground outside of the storage areas. Two uncovered dumpsters are located behind the cullet pile (yellow arrows).



Photo 6 (SI851623): The inside of one of the two uncovered dumpsters located near the cullet storage area.



Photo 7 (SI851625): Northeastern view of the western side of the facility showing two rusted roof drainage pipes (yellow arrows). The pipe furthest to the right appeared to be missing a large connecting portion at the top.



Photo 8 (SI851627): Northeastern view of a storm drain catch basin on the south end of the eCullet warehouse. This drain appeared to flow to outfall 003.



Photo 9 (SI851628): Drainage pipes on the west side of the eCullet warehouse. These pipes appear to be in better condition than most of the other roof drainage pipes along the west side of SGCI.



Photo 10 (SI851631): Northern view of J.A. Jack & Sons, the business that shares the northern boundary of Saint-Gobain Containers. According to the facility, the drain shown falls on J.A. Jack & Sons property. Notice the deposited particulates blanketing the area.



Photo 11 (SI851632): Southeastern view of the baghouse on the north side of the eCullet warehouse. Notice the deposited particulates blanketing the area and the location of a storm drain (yellow arrow). This drain appeared to flow to outfall 004. It was unclear if the deposited particulates were a result of eCullet or J.A. Jack & Sons operations.



Photo 12 (SI851637): Uncovered dumpster on the north end of Ohio Ave (yellow arrow). The lid appeared to be pinned against the wall and the rolling wheels damaged at the time of inspection.



Photo 13 (SI851639): View of an uncovered metal scraps dumpster located on Ohio Ave.

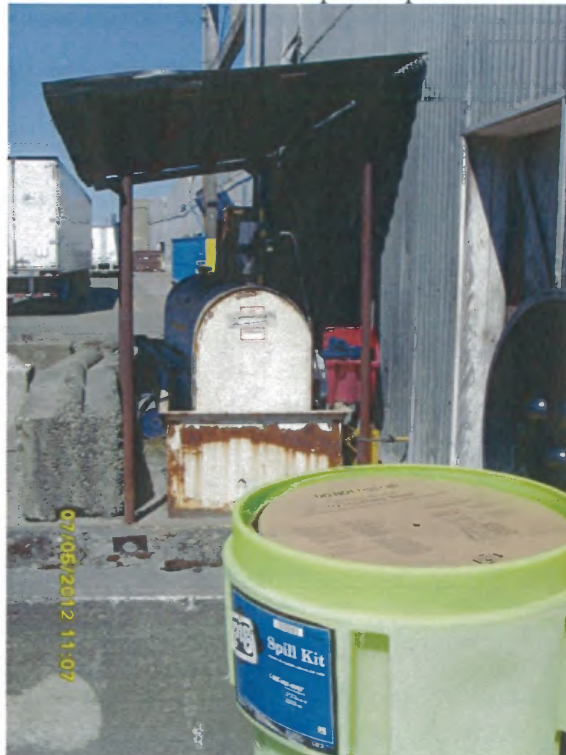


Photo 14 (SI851641): Spill kit (green barrel) located near a petroleum storage tank on Ohio Ave.



Photo 15 (SI851642): Two uncovered totes being stored on Ohio Ave without secondary containment. According to their labels, one was filled with glass mold (tote in foreground) and the other with bonding adhesives (tote in background).



Photo 16 (SI851646): Mold lubricant (left) and kerosene (right) barrels stored undercover and on a secondary containment pad on Ohio Ave.



Photo 17 (SI851648): Northern view of Ohio Ave showing the proximity of an immobilized front loader to the nearest storm drain. According to Mr. Trigg, all of the drains along Ohio Ave drain to outfall 002.



Photo 18 (SI851649): Northeastern view of the storm drain believed to drain to outfall 001. GPS point #105 was taken from this location.



Photo 19 (SI851650): Northern view of the storm drain believed to drain to outfall 001. GPS point #105 was taken from this location (yellow arrow).

ATTACHMENT C

Stormwater Pollution Prevention Plan